

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

AMIE & ROBERT PELLIGRINI,	:	
Individually and p.p.a. SAVERIO	:	
PELLIGRINI and MAXIMUS	:	
PELLIGRINI, minors	:	
	:	
v.	:	C.A. NO: 05-10387-NMG
	:	
BARBARA STRICKER-FRIEDMAN, M.D.;	:	
OB/GYN GROUP OF ATTLEBORO,	:	
INC.; JOHN and JANE DOE, M.D., Alias;	:	
and JOHN DOE CORPORATION, Alias	:	

JOINT STATEMENT

Now come the parties, plaintiffs Amie & Robert Pelligrini and defendants Barbara Stricker-Friedman, M.D. and OB/GYN Group of Attleboro, Inc., by and through their undersigned attorneys, and pursuant to this Court's Notice of Scheduling Conference file this Joint Statement, and further thereto respectfully state as follows:

I. Joint Discovery Plan

Planned Discovery:

A description of key discovery phases and efforts the parties plan to pursue is described below together with the times within which each phase/effort will be pursued:

(1) Initial Disclosures:

Parties stipulate, in accordance with Fed. R. Civ. P. 26(a), that the parties' initial disclosures will be due on or before:

February 20, 2006

(2) Fact Discovery:

The parties will commence fact discovery—including written interrogatories, requests for production, motions to compel, requests for inspection, requests for admission, and fact and record depositions—so that it will be completed by and close on:

October 30, 2006

(3) Disclosure of Expert Testimony:

Parties stipulate, in accordance with Fed. R. Civ. P. 26(a)(2)(C), that disclosures of expert testimony will be due on or before:

January 15, 2007.

Parties further stipulate that disclosures of expert testimony of additional, rebuttal experts, if necessary, will be due on or before:

March 1, 2007

(4) Expert Depositions:

Shall not commence before March 1, 2007 and will be completed on or before:

June 1, 2007

II. Joint Discovery Plan - Other Matters: None.

III. Disagreement or Unresolved Issues Concerning Discovery Matters: None.

IV. Third Party Claims, Joinder of Parties:

Parties agree that the final date for filing motions for leave to file third party claims, motions to join parties is on or before:

April 1, 2006

V. Potentially Dispositive Motions:

Parties agree that the final date for filing motions for summary judgment, and all other potentially dispositive motions should be April 1, 2007.

VI. Settlement and Alternative Dispute Resolution:

Parties may be willing to explore Alternative Dispute Resolution.

Parties do not consent at this time to trial presided over by United States Magistrate, but may do so in the future.

VII. Preliminary Pre-Trial Conference:

The Parties request a preliminary Pre-Trial Conference at the closure of fact discovery.

VIII. Final Pre-Trial Conference and Trial:

Subject to pending dispositive motions, if any, parties agree that they will be ready for a Final Pre-Trial Conference on or after:

June 15, 2007

and for trial on or after

July 1, 2007.

Trial is expected to take approximately two weeks.

IX. Pre-Trial Disclosures and Final Pre-Trial Procedures:

Parties acknowledge that they are aware of and will comply with Pre-Trial disclosure requirements in Fed. R. Civ. P. 26(a)(3).

X. Other Matters: None.

Plaintiffs,
By their attorneys

s/ Amato A. DeLuca

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Defendants, Barbara Stricker-Friedman, M.D.
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By their attorneys

s/Nancy Watson

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Dated: February 1, 2006